



Joseph H. Mizrahi – Attorney
300 Cadman Plaza W, 12th Floor
Brooklyn, NY 11201
P: 929-575-4175 | F: 929-575-4195
E: joseph@cml.legal | W: cml.legal

February 3, 2021

VIA ECF

Hon. Judge John G. Koeltl
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Application granted. SO ORDERED.

New York, New York /s/ John G. Koeltl
February 4, 2021 John G. Koeltl, U.S.D.J.

Re: Romero v. Electronic Express, Inc.; Case No: 1:20-cv-09077-JGK

Dear Judge Koeltl,

The undersigned represents Plaintiff Josue Romero (hereinafter “Plaintiff”) in the above-referenced matter.

The initial conference for this matter is set for February 4, 2021 at 3:00 p.m. It is now February 3, 2021 and Defendant has yet to appear. Defendant's answer was due January 29, 2021. Plaintiff is in the process of obtaining a Certificate of Default from the Clerk of the Court as to Defendant, Electronic Express, Inc., and will promptly be moving the Court for a Default Judgment in accordance with its Individual Rules.

In light of the above, the undersigned requests that the February 4th Conference be adjourned sine die, and further requests that Plaintiff be granted an additional 30 days in which to both obtain said Certificate of Default and present the Court with an Order to Show Cause for default judgment if Defendant fails to appear.

Thank you for your time and consideration of the above request.

Respectfully submitted,

/s/ Joseph H. Mizrahi
Joseph H. Mizrahi, Esq.